

# Wilson Telephone Company

2504 Avenue D PO Box 190 Wilson, KS 67490 (785) 658-2111 800-432-7607 in KS Fax: (785) 658-3344

February 2, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 - 12th Street, SW Washington, DC 20554 FEB 6 2006
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Re:

EB-06-TC-060 / EB Docket No. 06-36

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Byron McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

All inquiries in connection with this filing should be addressed to our office.

Sincerely,

Brian J. Boisvert

General Manager/Vice President

mz

cc: Byron McCoy

**Telecommunications Consumers Division** 

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Byron McCoy Telecommunications Consumers Division Enforcement Bureau Federal Communications Commission Room 4-A234 445 - 12th Street, SW Washington, DC 20554

Re:

EB-06-TC-060 / EB Docket No. 06-36

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Sincerely,

Brian J. Boisvert

General Manager/Vice President

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cc: Marlene H. Dortch

Office of Secretary

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## Certification of CPNI Filing 02/02/2006

Wilson Telephone Company, Inc.

EB-06-TC-060 / EB Docket No. 06-36

Wilson Telephone Company, Inc. hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Wilson Telephone Company, Inc. uses its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, dependent on use, given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage.

Wilson Telephone Company, Inc.'s employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations and Wilson Telephone Company, Inc.'s statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal.

Employees may easily determine the CPNI status of individual customers prior to using CPNI. Wilson Telephone Company, Inc. maintains a written log regarding outbound usage of CPNI including a description of the marketing activity, which products and/or services were marketed and the specific CPNI used. All sales and marketing personnel obtain approval from his/her supervisor of any outbound usage of CPNI. Wilson Telephone Company, Inc. currently does not sell, rent or otherwise disclose customers' CPNI to non-affiliated entities. If Wilson Telephone Company, Inc.'s affiliates are allowed to access customers' CPNI, then such disclosure is noted in the written log.

In compliance with the Commission's rules, Wilson Telephone Company, Inc. does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.

# Your Hometown Communications Specialists



2504 Avenue D PO Bex 190 Wilson KS 67490-0190 (785) 658-2111 (800) 432-7607 Fax (785) 658-3344

## Operating Procedures – Customer Proprietary Network Information (CPNI)

#### Purpose

The purpose of these procedures is to ensure the protection and confidentiality of CPNI as mandated by and in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

### General Program Management

**Responsibility:** The General Manager/Vice President is responsible for this program and has authority to make necessary decisions to ensure the success for this plan. Copies of the written program may be obtained from the business office.

## Methods of Compliance

- Wilson Telephone Company Inc has chosen the opt-out approval method for customers to indicate their intended usage of CPNI
- Opt-out notices will be provided to all customers every two years, occurring in October
- Opt-out notices and forms will be included with a new customer's welcome packet
- The opt-out means available to all customers at no charge, 24 hours a day, seven days a week is to call the business office at (785) 658-2111 or (800) 432-7607
- Customer Service Reps will follow-up with mailing the Opt-Out Form to the customer requesting restriction of their CPNI
- Annual self-certification that the company has established operating procedures in compliance with the regulations will be signed by a company officer, occurring in October
- These procedures will be reviewed and/or updated whenever FCC rulings might affect the current procedures



October 1, 2005

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## **Annual Certification**

Customer Proprietary Network Information Procedures of Wilson Telephone Company, Inc.

I, Brian J. Boisvert, hereby certify that I have personal knowledge that Wilson Telephone Company, Inc., has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Wilson Telephone Company, Inc. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§ 64.2001-64.2009.

Signed:

By: Brian J. Boisvert, General Manager/Vice President

Your Hometown Communications Specialists